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*Counsel for Robert Bosch LLC*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE CHRYSLER-DODGE-JEEP  
ECODIESEL MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:17-md-02777-EMC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND TIME TO FILE  
JOINT CASE MANAGEMENT  
CONFERENCE STATEMENT**

The Honorable Edward M. Chen

WHEREAS, the Court set an August 8, 2017 case management conference in Pretrial  
Order Number 3 ("PTO 3") (Dkt. 173);

WHEREAS, PTO 3 requires the Plaintiffs' Steering Committee (the "PSC"), Government  
Coordinating Counsel, and counsel for the Defendants (collectively, the "Parties") to file a joint

1 case management conference statement one week prior to the August 8, 2017 case management  
2 conference;

3 WHEREAS, the PSC and Government Coordinating Counsel have met and conferred with  
4 counsel for the Defendants regarding the joint case management conference statement;

5 WHEREAS, due to the complexities of this litigation, the Parties require an additional 48  
6 hours to continue to negotiate the joint case management conference statement;

7 WHEREAS, as set forth in the accompany declaration of Plaintiffs' Lead Counsel  
8 Elizabeth J. Cabraser, the Parties have not requested any previous extension of time;

9 IT IS THEREFORE STIPULATED AND AGREED by the Parties, subject to the Court's  
10 approval, as follows:<sup>1</sup>

11 1. The deadline for the Parties to file their joint case management conference  
12 statement is August 3, 2017.

13 **SO STIPULATED.**

14 Dated: August 1, 2017

Respectfully submitted,

15 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

16  
17 By: /s/ Elizabeth J. Cabraser

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21 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering*  
22 *Committee*

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28 <sup>1</sup> In entering into this stipulation, Defendants do not waive, and expressly preserve, all defenses,  
including all defenses concerning jurisdiction.

1 Dated: August 1, 2017

SULLIVAN & CROMWELL LLP

2  
3 By: /s/ Robert J. Giuffra, Jr.  
Robert J. Giuffra, Jr.

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10 *Counsel for Fiat Chrysler Automobiles N.V. and FCA US LLC*

11 Dated: August 1, 2017

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17 *Counsel for Robert Bosch LLC*

18 Dated: August 1, 2017

U.S. DEPARTMENT OF JUSTICE

19 By: /s/ Leigh P. Rendé  
20 Leigh P. Rendé

21 United States Department of Justice  
22 Environment and Natural Resources Division  
23 Environmental Enforcement Section  
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28 *Government Coordinating Counsel*

1                    **~~PROPOSED~~ ORDER GRANTING STIPULATION TO EXTEND TIME**

2                    Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation to Extend  
3                    Time to File Joint Case Management Conference Statement. The deadline for the Parties to file  
4                    their joint case management conference statement is August 3, 2017

5                    IT IS SO ORDERED.

6                    DATED: 8/2, 2017.



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Dated: August 1, 2017

/s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on August 1, 2017, a true and correct copy of the foregoing  
3 was electronically filed and served electronically via the Court's CM/ECF system, which will  
4 automatically serve notice to all registered counsel of record.

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6 /s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser  
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